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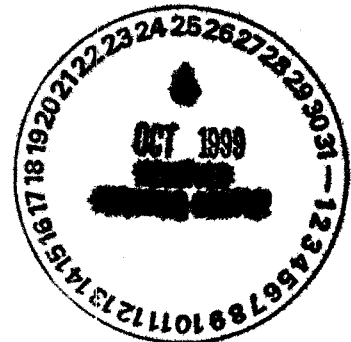
779 Closure Project

779 CLUSTER CLOSURE PROJECT

Non-Radiological Closeout Plan

Revision 0
September 27, 1999

Rocky Mountain
Remediation Services, L.L.C.



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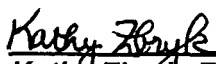
By Donna K. Kline

Date 10/14/99

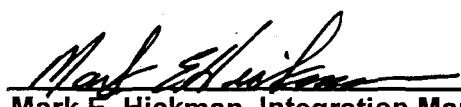
**BUILDING 779
NON-RADIOLOGICAL CLOSEOUT PLAN**

**Revision O
September 1999**

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1.0 INTRODUCTION

1.1 Purpose

The purpose of this plan is to:

Ensure that sufficient characterization and remediation (as necessary) has occurred, in accordance with Decommissioning Operations Plan for the 779 Cluster Interim Measure/Interim Remedial Action (779 DOP) and Reconnaissance Level Characterization Report (RLCR) for non-radiological contaminants to allow demolition of the 779 Cluster. Prior to demolition of an area, the requirements of this plan will be evoked. By completing the steps identified in this plan, RFETS will ensure that all contaminants of concern (COCs) have been removed, or remediated to a level below regulated levels.

1.2 Scope

This plan identifies the non-radiological closeout activities for the buildings (areas) designated for demolition in the 779 Cluster Demolition Plan. The buildings designated for demolition are 727, 779, 782, and 783. Building 779 was used as a Nuclear Weapons Research & Development Center, and contained process and laboratory equipment used to conduct material and environmental testing. Building 779 will be demolished in stages starting with the Administrative Area, A-annex, and then the remainder of the building. Building 782 served as a filter plenum for Building 779. Building 727 housed the emergency generator for Building 782. Building 783 contained cooling tower pumping equipment to support Building 779. For a detailed description of the 779 Cluster buildings, refer to the 779 DOP.

Radiological closeout activities are not addressed in this plan. Refer to RF/RMRS-97-123.UN, "Closeout Radiological Survey Plan for the Building 779 Cluster", Rev. 2, June 1999 for information concerning radiological surveys.

1.3 Closeout Plan Overview

The Non- Radiological Closeout Plan (NRCP) documents the methods for handling contaminants of concern (COCs), as identified in the RLCR, from completion of the RLCR through final inspection. The final inspection is completed between release of the area for final radiological survey and prior to demolition.

The steps taken for the NRCP are:

1. Review the RLCR to determine the COCs;
2. Review the sampling documentation to determine if any new contaminants were identified;
3. Review applicable closure documents, records, and logs to determine how the COCs were remediated;
4. Review applicable closure documents to verify RCRA units were properly closed;

5. Assemble documents to validate that appropriate sampling and remediation actions have been completed; and
6. Complete the final inspection of the area and document the results on the Non-Radiological Survey Checklist (NRSC), see Attachment 1.

The final inspection will consist of visual inspections to confirm that components and materials, that have been previously identified and may have contained contaminants of concern, have been removed and that there are no areas of unusual staining. These inspections will be performed and documented by technically competent members of the project staff. The existence of components, materials, and/or staining will be easily recognized by visual inspection, and therefore, the chance of error is minimal.

If components or materials remain, their existence will be documented and justified or they will be removed and properly disposed of. If unusual staining is identified, the staining will be investigated, and sampling will be performed if necessary to characterize the stain. Based on the resulting analytical data, the stain will either be left in place, removed using scarification, or, in the case of building slabs, sealed in place until the slab is remediated. This process is described in more detail in Section 4 of this plan.

7. Summarize and submit the assembled documents from step 5, and step 6 as the Non-Radiological Survey Report (NRSR) for the area to be demolished.

2.0 PREREQUISITE ACTIVITIES

Prerequisites to the Non-Radiological Closeout Visual Inspection include building stripout, identification and removal of non-radiological contaminants, and closure of RCRA units. This section of the plan summarizes each of the prerequisite activities.

2.1 Identification and Removal of Contaminants of Concern

The Reconnaissance Level Characterization Report for the 779 Cluster (RLCR), Rev. 0, December 17, 1997 was developed to identify and document the RCRA and CERCLA contaminants introduced into 779 Cluster buildings. This report was used to support stripout activities and to ensure that all contaminants of concern were removed or reduced to levels that do not represent a significant risk to human health or the environment.

The RLCR summarized the available historical data and process information pertaining to the 779 Cluster. The non-radiological contaminants of concern (as identified in the RLCR and the 779 DOP are as follows:

- Asbestos Containing Material (ACM)
- Beryllium contamination
- Polychlorinated Biphenyl (PCBs)
- RCRA regulated waste chemicals

- Solid materials potentially containing contaminants above RCRA regulated levels.

The RLCR states that additional characterization (in process) will be conducted as an on-going process. In-process characterization of structures, equipment, and systems will be conducted throughout the duration of this project to support facility stripout and waste characterization. The in-process characterization, as well as reconnaissance level characterizations, will be used to support waste disposal decisions and to demonstrate that non-radiological contaminants have been removed or reduced to levels below regulatory limits. Integrated Work Control Program (IWCP) packages and special reports document in-process characterization of non-radiological contaminants.

2.1.1 Asbestos

The 779 Cluster was previously characterized for asbestos in order to complete the RLCR and initial abatement planning. A summary of the asbestos characterization is contained in the RLCR. No further asbestos characterization was required prior to starting the decommissioning activities. A State-certified individual will complete in-process asbestos characterization to support the overall stripout and demolition effort. A certified asbestos abatement contractor will complete the asbestos abatement. After asbestos abatement is complete, an independent State-certified inspector will obtain air clearance samples and perform visual inspections to verify that asbestos is properly abated. Where applicable, asbestos abatement clearance testing will be performed in accordance with the Asbestos Hazard Emergency Response Act (AHERA) Protocol for Clearance Testing, (if the arithmetic mean of the five air samples is less than 0.01 fibers per cm³ (PCM analysis), the area is considered to be free of asbestos). Otherwise clearance criteria established in the Kaiser-Hill Occupational Safety and Industrial Hygiene Program Manual, Section 19, will be used to clear the area.

2.1.2 Beryllium

Beryllium was managed to a house cleaning level of 25 µg/ft² during the initial facility characterization of the 779 Cluster. The initial beryllium samples were analyzed on site using the Beryllium Activation Swipe Tester (BEAST). Subsequent beryllium samples were sent off site to an approved RFETS lab.

Work areas and equipment where beryllium is known or suspected to exist (based on proximity to an area where beryllium has been used or identified), are to be surveyed prior to disruption or removal in accordance with project specific beryllium remediation plans. Using a risk-based approach, buildings and areas with a higher probability of beryllium contamination will have a higher number of samples taken within them. Buildings with less likelihood of contamination will have less samples taken within them. For buildings where there is little likelihood that beryllium was ever introduced, historical and process knowledge will be used to determine sampling requirements, if any.

Samples will be managed using the chain-of-custody process and samples will be analyzed in a laboratory that meets the Site Analytical Services Division certification requirements. A facility or a piece of equipment will be considered suitable for free-release, in accordance with Site beryllium release criteria, if demonstrated to be less than 0.2 μg beryllium per 100 cm^2 .

2.1.3 Polychlorinated Biphenyl (PCBs)

Material contaminated with PCBs shall be categorized as either PCB-bulk product waste or PCB remediation waste in accordance with 40 CFR 761.

Sampling of porous surfaces shall be performed as described in EPA 560/5/86-017. To assess material/media against the appropriate regulatory threshold for PCB-contaminated media, SW-846 Method 4020, Screening for PCBs by Immunoassay, will be used, whereas Method 8082, PCBs by Gas Chromatography, shall be used for non-aqueous liquids. The regulatory threshold of 50 mg/kg will be used to segregate PCB bulk product materials from materials not subject to the Toxic Substance Control Act (TSCA) 40 CFR 761, Subpart D disposal restrictions.

Materials classified as PCB bulk product material, such as fluorescent light ballasts, will not be sampled. In lieu of sampling, the 779 Closure Project will meet the disposal requirements identified in 40CFR Part 761.62.

The major potential sources of PCBs in the 779 Cluster are oil (contained in equipment) and lighting ballast. Equipment containing oils will be evaluated for PCBs and managed in accordance with procedure 94-MP/IE, Management Plan for Material Contained in Idle Equipment or Toxic Substance Control Act requirements, as applicable.

2.1.4 Solid Material Potentially Containing RCRA Regulated Material

The most abundant materials in this category are painted surfaces. Characterization of lead-based paints is required for worker protection under OSHA's lead abatement program and hazardous waste characterization in accordance with 6 CCR 1007-3, Part 261.64. RFETS' personnel have evaluated different types of surfaces painted with lead-based paints and paint containing heavy metals (lead, cadmium, chromium). The evaluation concluded that painted surfaces at RFETS are non-hazardous waste forms. This determination was based upon hundreds of samples taken throughout RFETS. As part of a continuing evaluation, 50 paint samples have been taken in the 779 Cluster facilities. Results of the project specific samples will be discussed in the applicable NRCPR.

2.1.5 RCRA Regulated Waste Chemicals

Prior to starting 779 decommissioning activities, deactivation activities were completed. The scope of hazardous chemical removal includes any chemicals discovered subsequent to the completion of the Chemical Roundup for the 779 Cluster. These subsequently identified chemicals will be characterized in accordance with 6 CCR 1007-3, Part 262.11 and if determined to be hazardous

waste, they will be managed in accordance with RCRA. EPA SW-846 approved analytical methods will be used if sampling and analysis are required.

2.1.6 In Process Waste Characterization

Waste characterization sampling and analysis will:

- Follow EPA SW-846 for representative sampling requirements, as applicable;
- Comply with all applicable EPA SW-846 protocols;
- Be analyzed in a laboratory meeting the Site Analytical Services Division certification requirements.

Waste determined to hazardous will be managed following the substantive requirements of RCRA.

2.2 Building Stripout

Building stripout includes removal of equipment including, but not limited to the following:

- Gloveboxes
- Hoods
- Pumps
- Compressors
- Tanks
- Piping Systems (e.g., process piping, valves, and miscellaneous components)
- Electrical Equipment (e.g., emergency generators, transformers, junction boxes, conduit, cable, switches)
- Ventilation Systems (e.g., duct, fans, plenums, heat exchangers).

Stripout also includes decontamination (e.g., scabbling) of building surfaces, as required, to remove non-radiological contaminants. Some building internal walls may be removed to allow for removal of large components (e.g., gloveboxes) or as part of the decontamination process. If the area being decontaminated is not associated with a RCRA Unit, TSCA area, or RCRA/TSCA spill, visual inspection will be sufficient to determine removal of non-radiological contaminants.

At the conclusion of the stripout process, all that will remain are the basic building structures, such as ceilings, walls, floors, and components that do not interfere with the final radiological and non-radiological closeout surveys. Components that are left in the building will be segregated from the building rubble during demolition.

2.3 RCRA Units

At the start of the 779 Cluster Decommissioning Project, there were three RCRA units located in the 779 Cluster. All three units were located in Building 779. These three units were:

- ◆ Units 90.37: Room 131 - GB-131A, 131B, 131D, and 131E
- ◆ Units 90.39: Room 137 - GB- 106-1, 106-2, 106-3, 106-4, and 106-5; Hoods 106-1 and 106-2
- ◆ Units 90.43: Room 160 - GB-860

These units have been closed in accordance with the LRA-approved Closure Description Documents contained in Section 9 of the 779 DOP.

Temporary Units (RCRA TUs) will be established and closed throughout the duration of the Project in support of waste management. Presently the entire demolition area is a RCRA TU that will be administratively closed at the end of the Project.

The T-5 Tank System was closed in accordance with the RCRA Part B Permit in September 1995. In June of 1999, a CDPHE-approved field modification was initiated, in accordance with the RFCA, to reopen the T-5 system for transferring hazardous liquid; specifically, approximately 500 gallons of arsenic (D004) contaminated water from a cooling water system. Bi-weekly inspections of the portions of the system used were initiated and will continue until the system is closed as a regulated unit. When the system is no longer required, the system would be flushed with water and a sample of the flush water taken at a point outside of the 779 Cluster project boundary. The sample will be analyzed for the contaminant of concern (D004). Flushing will continue until the water sample results are below the regulatory threshold of 5 mg/l.

3.0 DATA QUALITY OBJECTIVES

The following seven step process derived from EPA QA/G-4, *The Data Quality Objective Process*, has been utilized to develop this plan for the 779 Cluster.

3.1 Step 1 - State the Problem

The intended result of the stripout activities is to have structures that do not contain non-radiological contaminants at levels that represent a threat to human health or the environment. The 779 Cluster Closure Project will demonstrate to Kaiser-Hill, DOE, and the Lead Regulatory Agency (LRA) that the result has been achieved and that RCRA, CERCLA and TSCA contaminants have been removed or no longer represent a risk to human health and the environment.

3.2 Step 2 - Identify the Decision

The decision is that the facility or area to be demolished does not contain hazardous substances above regulated limits.

3.3 Step 3 - Identify Inputs to the Decision

Data from the Reconnaissance Level Characterization Report, in-process characterization, Integrated Work Control Program packages (IWCPs), and other

appropriate documentation, along with visual inspections, provide the information required to demonstrate that contaminants have been removed or reduced to levels that no longer present a threat to human life or the environment. Contaminants of concern and applicable regulatory criteria are discussed in Section 2.1 of this plan.

3.4 Step 4 - Define Decision Boundaries

The following 779 Cluster buildings are within the scope of this plan: B779, B782, B783, and B727. Concrete and asphalt surfaces, soil, and utilities not physically part of the 779 structures are not within the scope of this plan.

3.5 Step 5 - Develop a Decision Rule

- a. If data and documentation collected during facility stripout adequately support the decision, then demolition may proceed upon approval from Kaiser Hill, DOE, and the LRA.
- b. If data or documentation is determined to be inadequate, then the affected area will be remediated and sampled to demonstrate no regulatory levels are exceeded in the area to be demolished.
- c. If project personnel are unable to remediate the area, then the material will be characterized, removed, and disposed of in accordance with the applicable waste disposal requirements. If the area is part of the foundation that is going to remain in place for later environmental restoration, then the area will be protected to prevent release to the environment.
- d. If item b or c is required, then the actions specified will be repeated as required until data and documentation collected adequately support a decision to proceed. Demolition may then be performed upon approval from Kaiser Hill, DOE, and the LRA.

3.6 Step 6 - Specify Limits on Decision Errors

Sampling and analysis conducted prior to and during building stripout will be performed in accordance with the methodology specified in the applicable regulation, guidance provided in RFETS procedures, and/or Site Analytical Services Division procedures. Methodologies and criteria for characterization of COCs during stripout are discussed in Section 2.2 of this plan. The chain-of-custody requirements, sampling and analytical methodologies, acceptance criteria, and quality assurance provisions associated with the Site Analytical Services Division provides a high degree of assurance that sampling and measurement error has been minimized. The decision errors associated with the COCs are within relevant tolerances associated with of the respective analytical and sampling methods used.

3.7 Step 7 - Optimize the Decision for Obtaining Data

The combination of data collected from generation of the RLCR through the facility stripout and visual inspections performed following stripout are expected to provide the information necessary to support the decision that no hazardous substances are present above regulated levels in the facility to be demolished. The lack of adequate data to demonstrate the area is free of hazardous substances would result in some combination of remediation, sampling, and analysis.

4.0 NON-RADIOLOGICAL CLOSEOUT PLAN

This section describes the closeout characterization activities for the contaminants discussed in Section 2.1 of this plan. Following completion of the stripout process, documentation will be reviewed and visual inspections of the area will be completed to verify required activities have been completed and to look for unusual staining and odors. If necessary, sampling and analysis will be performed to supplement existing data or to address issues that were identified during the visual inspections. Results of the data collected throughout the project, visual inspections, and post-stripout surveys, if required, will be documented in a non-radiological closeout report.

4.1 Asbestos

Asbestos characterization and abatement will be conducted during building stripout as described in Section 2.1.1 of this plan. When abatement has been completed, a State-certified asbestos inspector will review the asbestos abatement IWCP package and associated documentation for accuracy and completeness prior to closeout of the IWCP package. In addition, the State-certified inspector will perform a final verification walk down. The results of the walk down will be documented. The approved IWCP package and walk down documentation will provide documented evidence that all regulated asbestos containing material has been removed from the buildings.

4.2 Beryllium

During the stripout phase, beryllium surveys will be conducted, in conjunction with and following work in areas or on equipment, where beryllium is known or suspect to exist. Upon completion of the stripout activities, all known or suspect beryllium-contaminated equipment will have been removed from the 779 Cluster and disposed of or free released. In addition, all areas known or suspect to be contaminated with beryllium will be decontaminated and surveyed to demonstrate compliance with the Site criteria of less than 0.2 μg beryllium per 100 cm^2 .

4.3 Polychlorinated Biphenyls (PCBs)

During the stripout process, material contaminated with PCBs will be categorized as either PCB bulk product waste or PCB remediation waste in accordance with 40 CFR 761 and 762. This material will be sampled, classified, and disposed of as described in Section 2.1.3 of this plan.

The major sources of PCBs in the 779 Cluster are oil (contained in equipment) and lighting ballast. Following completion of stripout activities, a facility inspection will be performed to verify that PCB containing equipment and lighting ballasts have been removed.

4.4 Hazardous Waste

Debris potentially contaminated with RCRA-listed constituents or possessing RCRA characteristics and waste chemicals will be characterized and disposed of as described in Section 2.1.4 of this plan. At the completion of the stripout process all hazardous waste will have been removed from the building. Visual inspections for staining and verification of component removal in RCRA Units will be conducted after stripout to ensure that all hazardous waste has been removed.

4.4.1 Staining Inspection

Following completion of the stripout phase, a visual inspection will be performed to identify and evaluate unusual staining on building surfaces. If unusual staining is identified, process knowledge will be re-evaluated in an attempt to identify the potential source. In the event that multiple potential sources are identified, or the stain is of unknown origin, sampling will be performed to characterize the stain. Based on the resulting analytical data, the stain will either be left in place, removed using scarification, or in the case of the building slab(s), sealed in place until the slab is remediated. The Project Manager will designate the qualified personnel who will perform this inspection and any necessary evaluations. This inspection will include documenting the following:

1. Location of the staining;
2. Unique characteristics such as size of the staining (to the best of the inspectors ability), color, unique odor;
3. Source or potential source of the stain (if identifiable through process knowledge);
4. Sampling requirements;
5. Analytical data;
6. Cleanup requirements;
7. Waste management requirements; and
8. Any resulting negotiations that result in a no cleanup action.

In the event that no unusual staining is identified, a memorandum will be placed in the project file to document the date of the inspection, the extent of the inspection, that no unusual staining was found, and the individual performing the

inspection. Documentation of unusual staining will be contained in the Non-Radiological Closeout Report (NRCR).

4.4.2 Component Removal Inspections

Section 2.2 of this plan describes the components that will be removed as part the stripout process. Components and equipment will be removed to facilitate the Radiological Closeout Survey of the area. Following completion of stripout activities, a facility inspection will be performed to verify that all components have been removed. This inspection will include evaluation of non-load-bearing walls scheduled to be removed during the stripout process as well as surfaces requiring scarification to remove surface contaminants. The Project Manager will designate the personnel who will perform this inspection and any necessary evaluations. If any component or material surface is identified that should have been removed, an evaluation will be performed. Based on this evaluation, the component will either be removed prior to demolition, or a report will be prepared that justifies removal and disposal during building demolition. This inspection will ensure that no components containing hazardous or potentially hazardous material (Idle equipment, Waste chemicals, RCRA Units, etc.) remain in the building during demolition.

4.5 RCRA Units

Section 2.1.5 of this plan discusses 779 Cluster RCRA units. By the time stripout activities have been completed, all permitted RCRA units in the 779 Cluster will have been closed. No further action regarding permitted RCRA units are included as part of this plan. The RCRA TU (the entire 779 Cluster area) will remain until all waste is removed.

5.0 QUALITY ASSURANCE

Quality Assurance relative to this closeout plan consists of document reviews, visual inspections, and if necessary sampling and analysis. The first part of this section of the plan describes quality aspects applicable to document reviews and inspections. The second section summarizes the quality assurance program used by RFETS Analytical Services. The latter program will be utilized if additional sampling and analysis is required after the stripout has been completed.

5.1 Document Reviews and Visual Inspections

The documents to be reviewed under this plan consist of IWCP packages and analytical data. IWCP packages will be processed in accordance with the quality assurance provisions included in the Integrated Work Control Program Manual (MAN-071-IWCP). Historical and process knowledge will be reviewed to determine if existing data are sufficient to make decisions pursuant to the Data Quality Objectives decision rules and to identify data gaps.

Visual inspections will be performed by technically qualified members of the project staff. Personnel will be assigned by the Project Manager and will include the following as appropriate: State-certified asbestos inspector, certified industrial hygienist, environmental technical advisor, decommissioning/construction specialists, and/or other technically competent member of the project staff.

5.2 Analytical Services

The following is a summary of the Quality Assurance (QA) program requirements used by RFETS Analytical Services.

QA Program Requirements Summary

- ❖ Development and implementation of a QA Program and documentation of the key elements of that QA Program through a written QA Plan.
- ❖ Preparation of and adherence to written SOPs.
- ❖ Adherence to the analytical methods and associated QC and documentation requirements provided in the Parameter Specific Analytical (PSA) Modules.
- ❖ Verification of analytical standards and documentation of the purity of reference standard materials and the purity and accuracy of solutions obtained from commercial suppliers.
- ❖ Participation in performance evaluation programs, including adherence to corrective action procedures.
- ❖ Participation in on-site laboratory evaluations, including adherence to corrective action procedures.
- ❖ Submission of all raw data and pertinent documentation.
- ❖ Submission of original documentation.

The laboratory QA/QC programs are designed to ensure that each laboratory generating data for this plan has systems for assuring that the precision, accuracy, completeness and representativeness of data generated are known and documented.

All analytical data generated for the Site Analytical Services Division (ASD) is subject to data assessment as identified in Procedure DA-GR01-v1-1, Analytical Services General Guidelines for Data Verification and Validation. This guideline addresses the procedures and terminology used to assess data verification and validation through evaluation of laboratory quality control data. The data verification and validation program outlined above has been developed to provide measures for laboratory performance as well as apply usability qualifiers to analytical data generated in conjunction with Environmental Monitoring and Restoration activities, Bioassay, Safe Drinking Water Act, Waste Characterization, and Industrial Hygiene activities. This document is used in conjunction with Parameter Specific Analytical (PSA) Modules that are analysis-specific and contain relevant analysis-specific QA/QC.

Data assessment is a generic term used for quality assurance evaluation of analytical chemistry. The assessment involves: 1) initial review of the data package by the contracted laboratory performing the analysis, 2) a cursory examination of the data by ASD personnel prior to customer release of preliminary data, 3) verification by subcontract personnel ranging from a cursory completeness check and QC verification of the Data Review Checklist to a more thorough check of the data, and 4) validation by ASD or a subcontractor personnel of the data package. The ASD verification and validation criteria are based on government-published standards and guidelines, primarily EPA CLP and SW-846 methods guidelines for organic and inorganic data evaluation and review.

5.2.1 Sampling QA/QC

Field sampling performed in support of 779 Cluster Closure will be conducted by trained Project professionals and the Analytical Services Division Sampling Team. Field sampling included calibration of field instruments, routine maintenance of equipment, chain of custody, unique sample identification, and field logbook notes. Sampling will be performed in accordance with Site standards.

5.2.2 Data Results

Data will be interpreted by Project personnel to make waste and free release determinations.

6.0 REFERENCES

- 6.1 Rocky Flats Cleanup Agreement's (RFCA)
- 6.2 Decommissioning Operations Plan For The 779 Cluster Interim Measure/Interim Remedial Action, Rev. 0, February 1998
- 6.3 Reconnaissance Level Characterization Plan for the 779 Cluster, Rev. 0, December 17, 1997
- 6.4 Reconnaissance Level Characterization Report for the 779 Cluster, Rev. 0, December 17, 1997
- 6.5 Asbestos Characterization Report for the 779 Cluster Project, Rev. 0, October 1997
- 6.6 Beryllium Surface Sample Locations
- 6.7 Lead/Metals in Paint Characterization For Building 779 Cluster, Rev. 0, August 6, 1998
- 6.8 Building 779 Cluster Closure Project Health and Safety Plan, Rev. 10, March 22, 1999.

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- 6.9 Radiological Closeout Survey Plan for The Building 779 Cluster, Rev. 2, June 1999
- 6.10 Radiological Closeout Survey Report for The Building 729 Cluster, Rev. 0, April 1998
- 6.11 RFETS Analytical Services Statement of Work
- 6.12 779 Cluster Decommissioning Project Waste Management Plan, Rev. 1, December 1997
- 6.13 Procedure DA-GR01-v1-1, Analytical Services General Guidelines for Data Verification and Validation
- 6.14 29 CFR 1926.1101, Colorado Regulation 8, Asbestos
- 6.15 The Chronic Beryllium Disease Prevention (CBDP) Program (as described in MAN-072-OS&IH PM, Number 28)
- 6.16 PCBs - 40 CFR 761; EPA 560/5/86-017; SW-846 Method 4020 Screening for PCBs by Immunoassay; Method 8082, PCBs by Gas Chromatography; disposal requirements - 40CFR Part 761.62.
- 6.17 6 CCR 1007-3, Part 262.11, Hazardous Waste Determination, and 40 CFR 268. SW-846
- 6.18 Toxicity Characteristic Leaching Procedure, EPA SW 846 Method 1311.
- 6.19 6 CCR 1007-3, Part 261.64, will be managed as hazardous waste.
- 6.20 MAN-071-IWCP, Integrated Work Control Program Manual
- 6.21 94-MP/IE, Management Plan for Material Contained in Idle Equipment
- 6.22 Toxic Substance Control Act
- 6.23 RMRS-QAPD-1, *Rocky Mountain Remediation Services Quality Assurance Program Description (QAPD)*, Rev 3, September 13, 1999

7.0 ATTACHMENT 1

779 CLUSTER CLOSURE PROJECT NON-RADIOLOGICAL CLOSEOUT PLAN VISUAL INSPECTION CHECK SHEET			
AREA/ROOMS INSPECTED:			
INSPECTION CATEGORY	YES	NO	COMMENTS
STAINING OBSERVED			
UNUSUAL ODOR PRESENT			
SPECIFIED COMPONENTS REMOVED			
ACTIONS REQUIRED:			
PERFORMED BY: _____ DATE: _____			